



THE CITY OF NEW YORK  
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September 24, 2020

**BY ECF**

Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: John Bunn v. City of New York, et al., 19-cv-04667 (RRM) (RLM)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department and one of the attorneys representing defendants City of New York, Stephen Chmil, and the Estate of John Barba (hereinafter “defendants”). In that capacity, I write to respectfully request: 1) a brief adjournment of the settlement conference currently scheduled for September 30, 2020 at 10:00 a.m. to October 14, 2020 at 10:00 a.m., or a date and time thereafter that is convenient for the Court; and 2) an extension of the current fact discovery deadline from October 2, 2020 to a date to be determined at the settlement conference if the case does not settle. All parties consent to these requests. Defendants apologize for not submitting this request two weeks prior to the scheduled settlement conference per Your Honor’s Individual Rules.

The reason for this request is that defendants require additional time to further evaluate this case and secure settlement authority so the settlement conference can be a productive one. While the parties have engaged in paper discovery to date, no depositions have been scheduled, and defendants feel it necessary to request an extension of the current fact discovery deadline from October 2, 2020 to a date to be determined at the settlement conference if the case does not settle.

Thank you for your time and consideration in this regard.

Respectfully submitted,

*Christopher D. DeLuca/s/*

Christopher D. DeLuca

Senior Counsel

Special Federal Litigation Division

cc: All Counsel of Record (By ECF)